SOUTHERN DISTRICT OF NEW YORK	v
HADASSAH ACADEMIC COLLEGE,	x : Case No. 18 Civ. 2446 (AT) :
Plainti	ff, : NOTICE OF MOTION
-against-	:
HADASSAH, THE WOMEN'S ZIONIST ORGANIZATION OF AMERICA, INC.,	: : :
Defend	

LINITED STATES DISTRICT COLIRT

PLEASE TAKE NOTICE that, upon the annexed declaration of Eric R. Levine, Esq., dated November 15, 2018, and the exhibits attached thereto, the accompanying memorandum of law, dated November 15, 2018, and all other pleadings and proceedings heretofore had herein, plaintiff Hadassah Academic College ("HAC") shall move this Court, before the Hon. Analisa Torres, United States District Judge, in Courtroom 15D, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, for an Order granting the following relief:

- (1) Pursuant to Fed. R. Civ. P. 59(e) and 60(b)(1) and (2) and Local Civil Rule 6.3: Reconsideration of the Court's Order, dated November 1, 2018 (Docket No. 44) ("Order"), which granted defendant's motion to dismiss, and upon reconsideration, vacatur of said Order and the Judgment, dated November 2, 2018 (Docket No. 45) that followed; and
- (2) Pursuant to Fed. R. Civ. P. 15(a)(2) and 16(b): Leave to amend the complaint in the form of the Proposed First Amended Complaint.

PLEASE TAKE FURTHER NOTICE that the time and date of this motion will be fixed by the Court, including the scheduling of oral argument, if any, and that the service of papers is governed by:

- (1) Judge Torres' Individual Practices In Civil Cases, dated September 5, 2018, Section
- IV, "Other Pretrial Guidelines," Subsection A, "Redactions and Filing Under Seal," Part (v), and
  - (2) Local Civil Rule 6.1(b) which provides in pertinent part as follows:
    - (2) any opposing affidavits and answering memoranda shall be served within fourteen days after service of the moving papers, and (3) any reply affidavits and memoranda of law shall be served within seven days after service of the answering papers. In computing periods of days, refer to Fed. R. Civ. P. 6 and Local Civil Rule 6.4.

Dated: New York, New York November 15, 2018

EISEMAN LEVINE LEHRHAUPT & KAKOYIANNIS, P.C.

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